

SCOTT WELLS, PhD, VOLUME II, 1-23-09

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IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)

Plaintiff,)

vs.)

TYSON FOODS, INC., et al,)

Defendants.)

4:05-CV-00329-TCK-SAJ

VOLUME II OF THE VIDEOTAPED

DEPOSITION OF SCOTT WELLS, PhD, produced as a
witness on behalf of the Defendants in the above
styled and numbered cause, taken on the 23rd day of
January, 2009, in the City of Tulsa, County of
Tulsa, State of Oklahoma, before me, Kristen Holmes,
a Certified Shorthand Reporter, duly certified under
and by virtue of the laws of the State of Oklahoma.

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1 River at Tahlequah, Baron Fork and Caney Creek may
2 be X and the total P may be Y, that total P does
3 have the ability to encourage internal recycling at
4 a later time as it decays. So if you're looking at
5 controlling in a system like this where the

09:22AM

6 sediments settle out and there is important nutrient
7 recycling, that's where the total P is important,
8 but it is true that in the water column it's just
9 soluble P that the algae are responding to, and the
10 question is, where does that soluble P come from?

09:22AM

11 Is it coming from the initial loading from the
12 rivers or is it being recycled due to the settling
13 of particulate phosphorus from the rivers and then
14 becoming soluble P later on?

15 Q Dr. Wells, is sediment-bound phosphorus a
16 significant pathway for phosphorus in this system?

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17 A Yes, and by significant it's -- it's -- it's
18 an important player, more than 10 percent.

19 Q Not something that you should ignore?

20 A Correct.

09:23AM

21 Q All right. If you'll turn to Page 14 of this
22 same article, it -- it appears to me in the -- the
23 first half of -- or the first part of that paragraph
24 that -- well, let me just read it. You say the
25 regression model does not predict any actual AF. Is

09:23AM

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